UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF NEW YORK

GEORGE RAMISHVILI,

Case No. 1:21-cv-274-GTS-TWD

Plaintiff,

Chief Judge Glenn T. Suddaby Magistrate Judge Thérèse W. Dancks

v.

TAMAR TORADZE,

Defendant.

JOINT STATUS UPDATE

Pursuant to the Court's Text Order (ECF No. 42), Plaintiff George Ramishvili ("Plaintiff" or "Mr. Ramishvili"), by and through his undersigned counsel, and *pro se* Defendant Tamar Toradze ("Defendant" or "Ms. Toradze"), jointly submit this status update to inform the Court that settlement discussions between the parties remain ongoing. The parties were unable to confer regarding settlement discussions until August 4, 2021 due to technical problems with Defendant's email account and scheduling conflicts. While the parties have not been able to reach a final resolution of the issues in dispute in this matter, the parties continue to engage in good-faith settlement discussions. To allow the parties to continue such discussions and to save the Court time and expense in this matter, the parties jointly respectfully request that the Court continue the Rule 16 Conference for an additional fourteen (14) days.

Dated: August 9, 2021 /s/ Rizwan A. Qureshi

Rizwan A. Qureshi (DC Bar No. 1024603) Reed Smith LLP 1301 K Street, N.W. Suite 1000 - East Tower Washington, DC 20005

Telephone: 202.414.9200

Facsimile: 202.414.9299 rqureshi@reedsmith.com (Admitted *Pro Hac Vice*)

Counsel for Plaintiff George Ramishvili

/s/ Tamar Toradze

Defendant (Pro Se)